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**FOR INFORMATIONAL PURPOSES ONLY. NO
RELIEF IS BEING REQUESTED FROM THE COURT
AND NO ACTION IS REQUIRED.**

*Counsel to Michael Wyse, in his capacity
as Plan Administrator for the Wind-Down
Debtor*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:) Chapter 11
VOYAGER DIGITAL HOLDINGS, INC., *et al.*,) Case No. 22-10943 (MEW)
Debtors.¹) (Jointly Administered)
)

**NOTICE OF SUBSTITUTION OF PLAN ADMINISTRATOR
OF THE VOYAGER WIND-DOWN DEBTOR**

PLEASE TAKE NOTICE that on March 10, 2023, the Court entered the *Corrected and Amended Order (I) Approving the Second Amended Disclosure Statement and (II) Confirming the Third Amended Joint Plan of Voyager Digital Holdings, Inc and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 1166] (the “Confirmation Order”) confirming the

¹ The Wind-Down Debtor in these chapter 11 cases consists of Voyager Digital Holdings, Inc. (7687), Voyager Digital, Ltd. (7224), and Voyager Digital, LLC (8013). The Wind-Down Debtor’s service address and principal place of business is 51 JFK Parkway, First Floor West, Short Hills, NJ 07078.

Third Amended Joint Plan of Voyager Digital Holdings, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 1166-1] (as amended, modified, or supplemented from time to time, the “Plan”),² which, among other things, provided for the appointment of the Plan Administrator.

PLEASE TAKE FURTHER NOTICE THAT on May 19, 2023, the Debtors filed the *Notice of (I) Entry of Corrected and Amended Order (A) Approving the Second Amended Disclosure Statement and (B) Confirming the Third Amended Joint Plan of Voyager Digital Holdings, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code and (II) Occurrence of Effective Date* [Docket No. 1405], which provided notice that the effective date of the Plan occurred on May 19, 2023 (the “Effective Date”).

PLEASE TAKE FURTHER NOTICE THAT on the Effective Date, Paul R. Hage was appointed as the Plan Administrator of Voyager Digital Holdings, Inc., *et al.* (collectively, the “Wind-Down Debtor”) and became the sole representative of the Wind-Down Debtor’s estates. [Docket No. 1166-1].

PLEASE TAKE FURTHER NOTICE THAT in accordance with Art. VII.4 of the Plan Administrator Agreement [Docket No. 1323], Paul R. Hage provided notice to the Oversight Committee on June 26, 2024 of his intention to resign as Plan Administrator.

PLEASE TAKE FURTHER NOTICE THAT, on the date hereof, Paul R. Hage formally resigned from the role of Plan Administrator, effective immediately.

PLEASE TAKE FURTHER NOTICE THAT the Oversight Committee has approved the appointment of Michael Wyse as the successor Plan Administrator effective as of the date hereof.

² Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to them in the Plan.

PLEASE TAKE FURTHER NOTICE THAT notices in this proceeding should be given to the successor Plan Administrator and his counsel at the following address:

Plan Administrator:

Michael Wyse
Wyse Advisors LLC
51 JFK Parkway
First Floor West
Short Hills, NJ 07078
E-mail: mwyse@wyseadvisorsllc.com

Counsel to the Plan Administrator:

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Dated: September 26, 2024
New York, New York

Respectfully submitted,

McDERMOTT WILL & EMERY LLP

/s/ Darren Azman

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